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February 22, 2019

**Via ECF**

The Honorable Lorna G. Schofield  
United States District Judge  
United States District Court, Southern District of New York  
Thurgood Marshall, United States Courthouse  
40 Foley Square, Courtroom 1106  
New York, New York, 10007  
(212) 805-0288

**Re: *Lijun Sun v. Blue Ocean Capital Group, Inc., Antony Liu, and  
Mengxian Zhang*, Civ. Action No. 19 Civ. 01033 (LGS)  
Request for Extension of Time to Respond to Complaint**

Your Honor:

We represent Defendants Blue Ocean Capital Group, Inc. ("Blue Ocean") and Antony Liu, in the above-referenced action. We also represent Mengxian Zhang, but do not appear on her behalf at this time as she has not been properly served (Plaintiff's counsel does not concede that Ms. Zhang was improperly served). We write to request a 30-day extension of time, from February 26, 2019 to March 28, 2019, to respond to the Complaint for Blue Ocean and Mr. Liu.

Plaintiff served Defendants Blue Ocean and Mr. Liu with the Complaint on February 5, 2019 and purported to serve Defendant Ms. Zhang (who is not a Blue Ocean employee) by leaving copies of the Complaint at Blue Ocean on the same date. The deadline for Blue Ocean and Mr. Liu to respond to the Complaint is February 26, 2019.

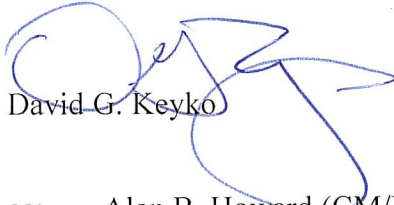
Defendants have not requested any prior adjournment or extension in connection with this matter. Plaintiff's counsel consented to Defendants' request for an extension as to Blue Ocean and Mr. Liu. This extension will not affect any other deadlines set by the Court in this action. We believe that the extension will aid the Parties' efforts to settle this matter in its entirety.

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We, therefore, respectfully request that the Court adjourn and extend Defendants' time to respond to the Complaint to March 28, 2019.

Respectfully submitted,

A handwritten signature in blue ink, appearing to read 'D. Keyko', is written over the printed name. The signature is stylized with a large loop at the beginning and a long horizontal stroke extending to the right.

David G. Keyko

cc: Alan B. Howard (CM/EMF)